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Attorney for Plaintiff

MAGDALENA KROWICKI

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MAGDALENA KROWICKI,

Plaintiff,

vs.

LOWE'S HOME CENTERS, LLC, a Nevada
Foreign Limited-Liability Company dba
LOWE'S STORE #1836; DOES 1 through 10;
and ROE CORPORATIONS 1 through 10,
inclusive,

Defendants.

Case No.: 2:20-cv-00923-KJD-NJK

**STIPULATED MOTION AND ORDER
TO EXTEND DEADLINE FOR FILING
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS PUNITIVE
DAMAGES**

IT IS HEREBY STIPULATED by and between, Plaintiff Magdalena Krowicki ("Plaintiff") by and through her attorney, Jonathan T. Remmel, Esq. of the Remmel Law Firm, and Defendant Lowe's Home Centers, LLC ("Defendant") by and through its attorney, Ashlie L. Surur, Esq. of Hall, Jaffe & Clayton, LLP, that the time for Plaintiff to file her opposition to Defendant's Motion to Dismiss Punitive Damages (Doc #5), filed May 29, 2020, be extended to and including **Friday, July 17, 2020**.

IT IS FURTHER STIPULATED that counsel for Plaintiff's father passed away this week and counsel will be traveling to Rochester, New York to attend his father's funeral and handle

other family matters. That as a result of this family emergency, Plaintiff needs additional time to file her opposition to Defendant's Motion to Dismiss Punitive Damages (#5).

Pursuant to Rule 6(b)(1)(B) which provides that for any act that must be done by a party to a federal court proceeding within a specified time frame, the court may "for good cause, extend the time.

The parties to this matter stipulate that good cause exists to extend the deadline to allow Plaintiff's counsel to attend the out of state funeral of his parent in Rochester, New York, and motion this Court to grant Plaintiff an extension to, and including, Friday, July 17, 2020 within which to file her opposition to Defendant's Motion to Dismiss Punitive Damages (#5).

DATED: 06/24/2020

DATED: 06/24/2020

REMMEL LAW FIRM

HALL JAFFE & CLAYTON, LLP

/s/ Jonathan T. Remmel
JONATHAN T. REMMEL, ESQ. (8627)
804 South Jones Boulevard
Las Vegas, NV 89107
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MAGDALENA KROWICKI

/s/ Ashlie L. Surur
ASHLIE L. SURUR, ESQ. (11290)
7425 Peak Drive
Las Vegas, NV 89128
Attorney for Defendant,
LOWE'S HOME CENTERS, LLC

ORDER

Pursuant to the parties' stipulation, **IT IS SO ORDERED**. Plaintiff shall have to and including **Friday, July 17, 2020** within which to file her opposition to Defendant's Motion to Dismiss (Doc #5), filed May 29, 2020.

Dated: 6/25/20


UNITED STATES DISTRICT JUDGE

Rebecca Lopez

From: Ashlie Surur [ASurur@lawhjc.com]
Sent: Wednesday, June 24, 2020 3:00 PM
To: Rebecca Lopez
Cc: Michele M. Stones; Jon Rimmel
Subject: RE: Krowicki v. Lowe's

Approved. You may file with my electronic signature.

ASHLIE L. SURUR, ESQ.

D: 702.316.4111 ext 125
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asurur@lawhjc.com

From: Rebecca Lopez <becky@remmellaw.com>
Sent: Wednesday, June 24, 2020 2:35 PM
To: Ashlie Surur <ASurur@lawhjc.com>
Cc: Michele M. Stones <MStones@lawhjc.com>; Jon Rimmel <jon@remmellaw.com>
Subject: RE: Krowicki v. Lowe's

Hi Ashlie – Attached is a draft Stip to Extend Plaintiff's Opposition Deadline a second time. Please review and let me know if you are okay with us submitting same with your electronic signature. Thanks again for your professional courtesies.

Sincerely,

Rebecca Lopez, Paralegal

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From: Ashlie Surur [<mailto:ASurur@lawhjc.com>]
Sent: Wednesday, June 24, 2020 1:07 PM
To: Rebecca Lopez
Cc: Michele M. Stones; Jon Rimmel
Subject: RE: Krowicki v. Lowe's

Yes. That's fine. Are you able to send over a stip?

Also, please extend our condolences to Jon and his family and wish him safe travels for us.

Ashlie

----- Original message -----

From: Rebecca Lopez <becky@remmellaw.com>